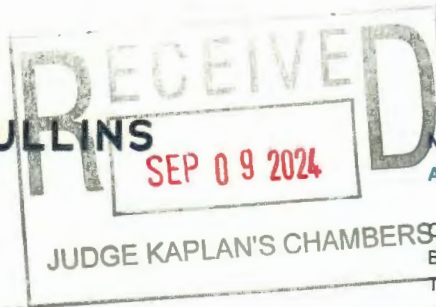


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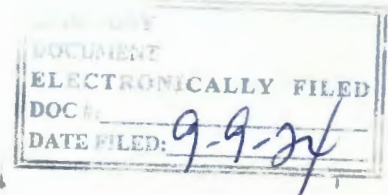
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September 6, 2024

**Via Federal Express**

The Honorable Lewis A. Kaplan, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

**RE: *In Re: Pliego et al.* Case 1:24-mc-00394-LAK**

Dear Judge Kaplan:

This firm represents Applicants Ricardo Benjamin Salinas Pliego and Corporacion RBS S.A. C.V. (the “**Applicants**”) in the above-referenced action. We write following submission of the Applicants’ Ex Parte Application for an Order Pursuant to 28 U.S.C. 1782 Authorizing Discovery for Use in a Foreign Proceeding, filed on August 23, 2024. (ECF 1-6), and Notice of Related Case, filed on the same date (ECF 7) (together, the “**1782 Application**”). We note that, although we have noted that the referenced action is related to an earlier filed case, *Chenming Holdings (Hong Kong) Limited v. John Does 1-10, et al.*, Docket No. 1:24-cv-00935-KPF, pending before Judge Failla, this matter is currently assigned to Your Honor.

This 1782 Application seeks to discover and confirm the whereabouts and certain assets, including those held in or transferred through bank accounts of Jurist IQ Corp, Jurist IQ’s Principal Jaitegh “JT” Singh and his law firm Singh Law Firm, P.A (collectively, “**Singh**”). Applicants require this information to support their pending action in England (the “**English Action**”) that seeks injunctive and other relief arising out of the alleged fraud of Applicants by Singh (and others).

Since filing the 1782 Application, the English Action continues to develop quickly, making the need for the information sought by the 1782 Application all the more urgent. For example, among the matters to be heard at an upcoming September 20, 2024, hearing in the English Action is the Applicants’ application to add Astor Capital Fund Ltd. (“**Astor Capital**”) as a defendant in the English Action, in addition to certain other applications (including an application by Astor

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Asset Management 3 Limited (“**Astor 3**”), and Vladimir “Val” Sklarov (collectively, among others, the “**Sklarov Parties**”)).<sup>1</sup>

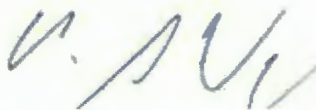
Of particular note, Mr. Sklarov has recently filed affidavits in the English Action (on behalf of the Sklarov Parties), essentially stating that they are powerless to provide certain information on the assets at issue because that information is held by others, including the respondents to the 1782 Application. The affidavits also confirmed that the hundreds of millions of dollars in Applicants’ shares that are the subject of the English Action and/or the traceable proceeds of the sale of such shares are or were previously held in, or were transferred through the accounts that are the subject of the 1782 Application.

Applicants have an urgent need in being prepared to defeat these measures by the Sklarov Parties to potentially delay an investigation or injunction of their role in the possession, transfer, and possible misappropriation of those assets.

Pursuant to Your Honor’s Individual Rules of Practice, and in light of the developments just described, Applicants respectfully request that the Court take action as soon as practicable on the 1782 Application. Applicants seek this information to make any updates available in the English Action, particularly where the 1782 Application and the English Action may inform one another.

We appreciate the Court’s consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'P. John Veysey', is written over a light blue horizontal line.

P. John Veysey

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<sup>1</sup> We understand the Court is familiar with Mr. Sklarov who was a party in at least one matter before this Court. *See Barclays PLC et. al. v. Sklarov*, No. 20-cv-8437 (S.D.N.Y. Oct. 9, 2020).